

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PLASMA AIR INTERNATIONAL, INC.,
LAWRENCE SUNSHINE, CLIFFORD
MILLER and VIPER HOLDING, LLC,

Plaintiffs,

-against-

AERISA, INC., ION INVESTMENT
PARTNERS, LLC, IONZ INTERNATIONAL,
INC., ALF MAURITZON, ECO ION
TECHNOLOGIES, LLC, and ECO-AIR
TECHNOLOGIES, LLC,

Defendants.

08 CV 02415 (GEL)

**NOTICE OF MOTION TO DISMISS, OR
ALTERNATIVELY, STAY OR TRANSFER THE COMPLAINT**

PLEASE TAKE NOTICE that pursuant to Rules 12(b)(2) and 12(b)(3) of the Federal Rules of Civil Procedure, and upon declaration Brian M. McQuaid dated April 10, 2008 of the accompanying Memorandum of Law, Defendants Aerisa, Inc. ("Aerisa"), Ion Investment Partners, LLC, IONZ International, Inc., Alf Mauritzson, Eco-Ion Technologies, LLC, and Eco-Air Technologies, LLC (collectively, "Aerisa") will, and hereby do, move this Court to dismiss, or alternatively, stay or transfer, the claims alleged in plaintiffs' Plasma Air International, Inc., and for such other and further relief as the Court may consider just and proper.

Pursuant to Local Civil Rule 6.1, any opposing affidavits and answering memoranda shall be served within ten business days after service of the moving papers.

SQUIRE, SANDERS & DEMPSEY L.L.P.

April 10, 2008

By:  _____

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